UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

APR 11 2013

Ms. Linda Campbell
Environmental, HST & Dev. Coordinator
SAPA Extruders, Inc.
330 Elmwood Avenue – Crestwood Industrial Park
Mountain Top, PA 18707

Re: Pollutant Monitoring & Reporting Requirements Review
PAP245985

Dear Ms. Campbell:

Operations/processes conducted at your facility in Mountaintop had previously been categorized as aluminum forming subject to the pollutant monitoring requirements or 40 CFR 467- Subpart C, pretreatment standards for new sources (PSNS). This determination was based on a major expansion at the facility after the 1982 NS date outlined by the previous owners.

The pollutant monitoring requirements for your facility are principally based on the current aluminum extrusion and anodizing processes conducted at your Crestwood Industrial Park Facility. Discharge limits values for the regulated pollutants are determined by the respective discharge limits standards (lbs/mil. off-lbs) x average production rate (mil. off-lbs/day) and are cumulative for the separate processes – core, baths, rinses, and scrubbers. The production rate for determination of limits is shown below. In general, any production rate that is different than the average by more than ± 20% was eliminated and the highest remaining reported production used to calculate the limits

date	11/1/12	4/24/12	10/31/11	5/16/11	12/6/10	5/10/10	12/31/09	
lbs/dy	50167	49214	38441	22897	32864	30051	29077	
ave				(36102)				<=(overall)
	+ 38.9%	+36.3%	+6.4%	- 36.6%	-9.10%	-16.8%	- 19.5	<= (% difference)
				(38441)				<=(representative value)

Below is a capsulated production/wastewater routing outline based on the 8/02 Process Flow Diagram for your facility. Production rates shown are based on the total production shown above and the percentages shown on the referenced flow diagram (copy enclosed):

<———————————[Al Billets]———————————>
.038441 mil. off-lbs/day total production
(60%)<==Shipped┤ PRODUCT ├Processed==>(40%)

Core Discharges: *0.038441 mil off lbs/dy [100% of total production]

1. Extrusion: [Al Billets cut to length -5"/7"/9"]

hauled<=[Holding Tk]<= press leakage <— 5" —> Heat Treat <— 7" • —• 9" —> rinses to Anodize Line Pit

2. Miscellaneous: [cool.tower]•[steam returns]•[mech. equipm. rm. sump]•[die rinse sump]—> Anodize Line Pit

Processes: **Shuttle Transfer-** *0.0153764 mil off-lbs/dy [40 % of total production]

a ├>[soap]•[soap rinse]•[etch ├scrubber┤ etch]•(r~rinses~r)•[etch desmut]•[rinse]——> Anodize Line Pit
4 bath – 3 rinse – 1 scrubber

*0.0038441 mil off-lbs/dy – [10% of total production]

b ├> **[Bright Dip]**•[scrubber]•(r~rinses~r)•[desmut]•[rinse]——————> Anodize Line Pit
no dump=┘ **hauled**<=┘
1 bath-1 rinse-1scrubber
(3 rinses hauled)

*0.0153764 mil off-lbs/dy- [40% of total production]

c ├> **[Anodize1** ├scrubber┤ **Anodize2]**•(r~rinses~r)•——————> Anodize Line Pit
2 bath-1rinse-1 scrubber

[2% of total production] *0.00076882 mil off-lbs/dy
d ├ **[Black Dye]**•[rinse]
shipped out=┘ —>
1 bath-1rinse

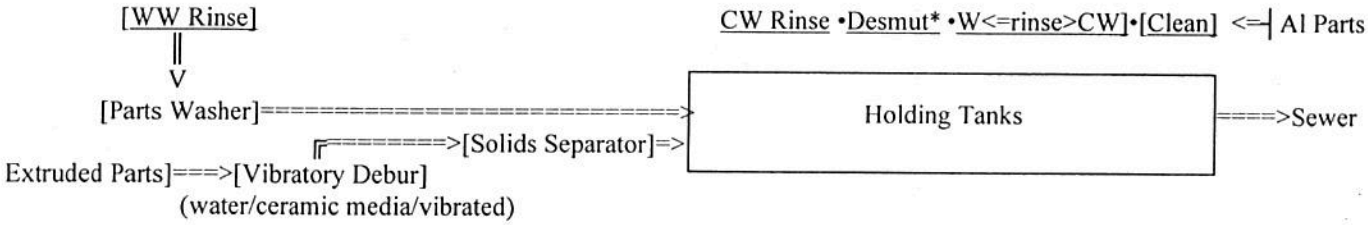
[0.2 % of total production] *0.000076882 mil off-lbs/dy
e ├ **[Gold Dye]**•[rinse]
1 bath-1 rinse

[40% of total production] *0.0153764 mil off-lbs/dy)
f ├ **[Seal]**•[rinse]•**[Air Dry]**=====> **SHIP**
—> Anodize Line Pit
1 bath-1rinse

Calculation of the discharge limits for the regulated pollutants, based on the cumulative processes and production levels determinations above, are outlined below. Note that no allocations are given for process wastewaters hauled offsite (extrusion press leakage, 3 bright dip rinses, black dye bath) or otherwise not discharged (bright dip bath).

[Operation/ Process]	[mil. off-#/dy]	[DMax<**Cr**>MAve]		[DMax<CN>Mave]		[DMax<(**Zn**)>MAve]		[DMax<O&G>MAve
Core:	[0.03844]	.00500	.00192	.00269	.00115	.01345	.00577	.13070
Shuttle/Transfer:	[0.01538]							
4 b —>	0.06151	.00412	.00166	.00221	.00092	.01125	.00461	.11010
3 r —>	0.04613	.02398	.00968	.01291	.00507	.06548	.02720	.64167
1 sc—>	0.01538	.01107	.00446	.00599	.00246	.03029	.01245	.29730
Bright Dip	[0.00384]							
no dump=┘ 1 b—>	0.00384	.00026	.00010	.00014	.00006	.00070	.00029	.00687
3 hauled<—>1 r —>	0.00384	.00200	.00081	.00108	.00042	.00545	.00227	.05341
1 sc—>	0.00384	.00276	.00111	.00150	.00061	.00756	.00311	.07423
Anodize	[0.01538]							
2 b—>	0.03076	.00206	.00083	.00111	.00046	.00563	.00231	.05506
1 r —>	0.01538	.00800	.00323	.00431	.00169	.02184	.00907	.21394
1 sc—>	0.01538	.01107	.00446	.00600	.00246	.03030	.01246	.29730
Black Dye	[0.00077]							
hauled<—1 b •	0.00077	--------	--------	-------	-------	--------	-------	-------
1 r —>	0.00077	.00040	.00016	.00022	.00008	.00109	.00045	.01071
Gold Dye	[0.000077]							
1 b—>	0.000077	.000005	.000002	.000003	.000001	.000014	.000006	.000138
1 r —>	0.000077	.000040	.000016	.000022	.000001	.000109	.000045	.001071
Seal	[0.01538]							
1 b—>	0.01538	.00103	.00042	.00055	.00023	.00281	.00115	.02753
1 r —>	0.01538	.00800	.00323	.00431	.00169	.02184	.00907	.21394
TOTALS=========>		.07980	~.03209 •	.04305 -CN-	.017302 •	.21781 -Zn-	.090261 •	2.13397

In place of the former chromate conversion process are the Parts Washing and Vibratory Deburring operations with wastewater disposal via a designated WWTS-2 route. §467.02(i) describes cleaning, or etching as a chemical solution bath and a rinse, or series of rinses, designed to produce a desired surface finish on the workpiece. Please provide the details (cleaning agents/chemicals used, production) for the operations/processes discharged to WWTS-2 and depicted below…



Upon your review and response to this letter, updated pollutant monitoring and reporting requirements will be issued for your facility. Should you have any questions, please contact Robert Hansford at (215) 814-5791 or myself at (215) 814-5790.

Sincerely,

John Lovell (3WP41)
Pretreatment Coordinator
NPDES Permits and Enforcement
Water Protection Division

Enclosure